



NOV - 4 1999

Mr. Robert Spiegel
Edison Wetlands Association, Inc.
PMB 180
1115 Inman Avenue
Edison, New Jersey 08820-1132

Dear Mr. Spiegel:

Your letter to Jeanne Fox, Regional Administrator, U.S. Environmental Protection Agency (EPA), dated September 29, 1999, has been referred to me for response.

Your letter transmitted the "Site Inspection Report" prepared by the Edison Wetlands Association (EWA) for the Cornell-Dubilier Electronics Superfund site, located in South Plainfield, New Jersey. According to your letter, EWA believes that the Cornell-Dubilier Electronics site constitutes a "public health hazard", and that the site needs closer review by EPA. The conclusions and recommendations identified in your "Site Inspection Report" are apparently based on a site visit conducted on September 9, 1999, with Pete Mannino, the EPA Remedial Project Manager.

EWA requested that EPA's removal program remove potentially contaminated surface materials from three areas within the fenced in property of the Cornell-Dubilier Electronics site. EPA has already taken numerous removal actions to address the findings of EPA's extensive sampling activities conducted at the site. These previous actions include: ordering the owners of the industrial park to limit the movement of contaminants from the industrial park; ordering potentially responsible parties for the site to remove contaminated soil from residential properties; and interior cleaning of PCB contaminated residential homes.

In March 1997, the current owners of the industrial park were ordered by EPA to take actions designed to reduce the potential for exposure to contaminants on site and limit the movement of contaminants off site. Pursuant to this order, large areas of the site were paved and the site was also fenced to restrict access and prevent the tracking of PCBs off the site and into the community. Drainage controls, such as silt fencing and sediment traps, were also engineered and installed to limit the movement of contaminants to the nearby Bound Brook through surface water run-off. Pursuant to this order, the current owners are also

responsible for maintaining these systems. EPA has recently informed the current owners that the work required by the Administrative Order on Consent has not been fully carried out and that they must establish vegetative cover in unvegetated, unpaved areas of the site. EPA's recent correspondence to the current property owners also included a requirement to repair the existing drainage controls located down gradient of unvegetated areas and maintain these controls, until such time as permanent vegetative cover is established. EPA believes that the implementation and maintenance of the planned actions should, in the short-term, sufficiently stabilize pollution at and around the site.

The "Site Inspection Report" recommends designating a dumping area in the Dismal Swamp as an operable unit of the Cornell-Dubilier Electronics site. As you are aware, the New Jersey Department of Environmental Protection (NJDEP) recently referred the Dismal Swamp area to EPA. We are currently evaluating this area and will take actions determined to be protective of human health and the environment based on the results of this evaluation. This area is being addressed independently from the Cornell-Dubilier Electronics site. If information becomes available to indicate that the Dismal Swamp area should be included as a satellite area of the Cornell-Dubilier site, EPA will re-evaluate this decision.

The "Site Inspection Report" also recommends that the security fence surrounding the former Cornell-Dubilier Electronics property be extended to encompass additional properties along Spicer Avenue. As previously mentioned, the site was fenced to restrict access and prevent the tracking of PCBs off site and into the community. A title search, conducted by EPA, indicated that the additional properties were not a part of the industrial park. We do however, intend to conduct soil sampling in this area as part of the Remedial Investigation/Feasibility Study (RI/FS).

We are interested in EWA's statement that the soil piles on New Market Avenue are representative of the material dredged approximately 10 years ago from New Market Pond. While we do not intend to sample these soil piles at this time, we would be pleased if you could supply any historical information or analytical data for this material. EPA has begun an investigation to determine the fate of the dredge material from New Market Pond. To date, EPA has not obtained information indicating the locations where the dredge material, which was apparently blended with soil and sand from other sources, was shipped. We intend to continue this investigation and provide you with the results as they become available.

EWA also recommends that EPA perform "hot-spot" soil removal for PCBs in the Bound Brook and New Market Pond. At EPA's request,

the New Jersey Department of Health and Senior Services (NJDHSS), through the Agency for Toxic Substances and Disease Registry (ATSDR), has conducted several health assessments for the site and has provided recommendations to EPA. These assessments have been conducted for each of the major sampling events conducted by the Agency. As documented in the most recent Health Consultation, dated October 1999, NJDHSS has reviewed the results of the soil and sediment samples collected by EPA along the Bound Brook. Based on this review, NJDHSS states that the Bound Brook poses no apparent health hazard to children and adults who utilize the brook for recreational purposes. The ATSDR and NJDHSS have also concluded that the surface soils and sediment contamination does not exist at levels of public health concern for the occasional users. However, the consultation did recommend that the current fish advisory be maintained for the Bound Brook and New Market Pond. Therefore, while EPA will evaluate remedial alternatives for the Bound Brook during the RI/FS, a removal response is not called for at this time.

The "Site Inspection Report" recommends that additional signs be installed in the New Market Pond so that subsistence fisherman will be aware of contamination in the fish and the pond. As you are aware, NJDEP has issued a fish consumption advisory for the Bound Brook and its tributaries as a result of EPA's off site investigation of PCB contamination. NJDEP would be responsible for posting any additional signs or publication of the advisory in periodic fishing digests. We will pass along your request to NJDEP.

EWA recommends that EPA appropriate funding to expedite its investigation of this site. EPA has already expedited removal actions to stabilize the site, and funding is available to perform an RI/FS. We are in the planning stages of the RI/FS, and expect to begin field work within the next few months to evaluate ground water, sediment, soil, and potential air pathways. With sites as large and complex as this one, we typically prioritize and phase the investigation and remedy selection to address the site as quickly as possible. We will explore such opportunities to expedite the clean up of this site.

Finally, EPA has previously held public meetings in the Towns of South Plainfield and Piscataway to inform area residents and local officials about the results of investigations and the status of ongoing actions related to the Cornell-Dubilier Electronics site. We realize the importance of providing the impacted communities with current information regarding site related activities, responding to their questions, and listening to their concerns. For these reasons, we have mobilized a trailer on Spicer Avenue and have met with many residents individually to discuss the on-going actions. We will continue to work with the local communities to disseminate information about the site as it becomes available.

During previous public meetings, EPA has introduced the Community Advisory Group (CAG) concept to the community and also offered the public technical assistance from the New Jersey Institute of Technology through the Technical Outreach Services for Communities Program. To date, we have not received a request for this assistance. Therefore, although we are willing to assist the community in determining the need for a CAG, we do not intend to hold a separate public meeting to re-introduce the CAG concept. Based on the level of previous EPA involvement, the impetus for establishing a CAG should come from the community. Such a request can come at any point in the cleanup process.

If you have any additional comments or questions, please feel free to call Mr. Mannino at 212-637-4395.

Sincerely yours,

Richard L. Caspe, Director
Emergency and Remedial Response Division

bcc: Peter Mannino, ERRD/NJRB